#### VIRGINIA:

# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

BLANCA LUZ ESPINOZA,		)	
		)	
Plaintiff,		)	
V.		)	
		)	Civil Action No. 1:17-cv-00859
AL JAZEERA RESTAURANT, INC.,	et al.,	)	
		)	
Defendants.		)	
		)	

### DEFENDANT'S RULE 26(a)(1) INITIAL DISCLOSURES

- I. Individuals Likely to Have Discoverable Information Related to Plaintiff's Claims
- A. Individuals Associated with Plaintiff
  - a. Slaiman Almassri, Principal
  - b. Sosena T. Almassri, Principal

Plaintiff's representatives. Full knowledge of claim and dispute; personal knowledge of the Plaintiff's work schedule, date employment ended, and rate of pay. Knowledge that Plaintiff was paid for all work, including any alleged overtime. Knowledge that Plaintiff's employment terminated April 2015.

- c. Elsa Kahssay, 6272 Edsall Road, #104, Alexandria, VA 22312. Co-Worker of Plaintiff; with knowledge of her work schedule, job duties, and pay.
- d. Berhanu Abderahman, 3100 S. Manchester Street, #642, Falls Church, VA 22044. Plaintiff's Manager during her work period, knew her work schedule, and is aware she was paid fully for all work performed, and that she never did work for which she was not paid.
- e. Tekola Taye, 7508 Abbington Drive, Oxon Hill, MD 20745. Co-Worker and Manager during the Plaintiff's employment, with knowledge of her employment hours, job duties, and rate of pay.
- f. Reema Fray, waitress/cashier, who worked with the Plaintiff.

В.	Individuals Associated with Defendant
	None
C.	Third Party Witnesses
	None
II.	Documents in Possession or Control of Plaintiff and Related to Plaintiff's Claims
6, 201 of the have c	Copies of Last two checks paid to the Plaintiff immediately prior to her departure, April 5. Prior thereto, the Plaintiff was always paid \$500.00 per week in cash. On the occasions pay for her last two weeks, ending April 6, checks were written as the Defendant did not eash.
Copie	s of these will be provided to Plaintiff's Counsel.
III.	Computation of Damages Claimed by Plaintiff
None	
	AL JAZEERA RESTAURANT, INC., et al. By Counsel

## HADEED LAW GROUP, P.C.

/s/ Michael Hadeed Jr.,

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Counsel for Defendants

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13 day of November, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system and by U.S. Mail, postage prepaid to:

Eduardo S. Garcia, Esq. 25 West Middle Lane Rockville, MD 20850 Telephone: (301) 340-2020 6 egarcia@steinsperling.com Counsel for Plaintiff

/s/ Michael Hadeed Jr.,

Michael M. Hadeed, Jr., Esquire, VSB #24589 510 King Street, Suite 400 Alexandria, Virginia 22314 (703) 962-7452 – telephone (703) 962-7473 - fax michael@hadeedlaw.com Counsel for Defendants